

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 1, 2, 15, 74,)	
78, 87, 90, and 97 of the Commission's)	
Rules Regarding Implementation of)	ET Docket No. 12-338
the Final Acts of the World)	PRM09ET
Radiocommunication Conference (Geneva,)	
2007) (WRC-07), Other Allocation Issues,)	
And Related Rules Updates)	

**INFORMAL REQUEST AND COMMENTS,
IN RE: WRC-12 ALLOCATION OF 472-479 kHz TO AMATEUR SERVICE**

To the Commission:

COMES NOW the undersigned JAMES EDWIN WHEDBEE, who pursuant to Paragraph 12 of the Notice of Proposed Rulemaking ("NPRM") and Section 1.41 of the Commission's Rules (47 CFR Section 1.41) informally requests the Commission proceed immediately to reallocation of 472-479 kHz to the amateur service on a secondary basis, and submits the following comments in support thereof.

[1] WRC-12 reallocated 472-479 kHz in the MF band to the amateur radio service as the 630 meter band.

[2] The undersigned informally requests the Commission proceed immediately to the reallocation of this 630 meter MF band to the amateur radio service on a secondary basis with a 1 Watt E.I.R.P. limitation and a 150 Hz maximum bandwidth of any emission. In connection with this informal request for reallocation, the undersigned further requests the 630 meter band be authorized to operator

classes of General or higher, with General Class operators being restricted to 474-476 kHz, and Advanced and Amateur Extra Class operators having the entire band available.

[3] As with the 135.7-137.8 kHz band, the undersigned proposes, in connection with his informal request of the Commission, that quasi-coordination occur between radio amateurs and PLC system operators, through UTC if available, or by station registration in ULS otherwise (reference here my comments regarding the LF allocation).

[4] In connection with the foregoing informal requests, the undersigned comments as follows...

(a) The WRC-12 allocation isn't going away. Furthermore, radio amateurs have a lengthy history of being good neighbors to others in their bands. Therefore, any delay in this reallocation is genuinely unnecessary and fruitless.

(b) The 472-479 kHz band is poorly used at this time. This request makes the best and highest use of this band.

(c) There is no apparent or obvious reason to deny the request. Study will not reveal any more than is currently known. Moreover, those who might otherwise be impelled to object to reallocation will object nevertheless at some future date. Accordingly, the inevitable is a proposal to reallocate this 630 meter band-better now than later.

(d) If the Commission cannot generally grant the informal requests hereinabove, the undersigned respectfully suggests the Commission consider case-by-

case approval of existing amateur radio stations in the 630 meter band conjunctively using the administrative update and waiver process in ULS.

WHEREFORE, the foregoing considered, the undersigned strongly and affirmatively recommends the Commission reallocate 1900-2000 kHz to the amateur radio service on a primary basis.

Respectfully Submitted:



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